



12 December 2014

Gas Industry Co
Level 8, The Todd Building
95 Customhouse Quay
PO Box 10-646
Wellington 6143

Trustpower Limited

Head Office
Truman Lane
RD 5
Tauranga

Postal Address:
Private Bag 12023
Tauranga Mail Centre
Tauranga 3143

T 07 572 9754
F 07 572 9825

Offices in
Auckland
Wellington
Christchurch
Oamaru

Freephone
0800 87 87 87

trustpower.co.nz

TRUSTPOWER SUBMISSION: CONSULTATION ON COMPLIANCE THRESHOLDS

Trustpower Limited ("Trustpower") welcomes the opportunity to provide a submission to the Gas Industry Co ("GIC") on its Consultation on Compliance Thresholds consultation paper ("the Consultation Paper").

Our answers to the specific questions posed in the Consultation Paper are attached in Appendix A.

For any questions relating to the material in this submission, please contact Fiona Smith on 07 572 9888.

Regards,

A handwritten signature in blue ink, appearing to read "J. Tipping".

JAMES TIPPING
REGULATORY STRATEGY MANAGER

ComplianceThresholds_TrustpowerSubmission_Dec2014_v1.0.docx

Appendix A: Responses to consultation questions

Question	Response
<p>1. Do you agree that the current guideline in relation to rule 37 of the Reconciliation Rules should be used as the threshold for reporting of breaches under the amended Regulations?</p>	<p>1.1 Trustpower supports the materiality limit of 200 GJ as an appropriate limit and we are comfortable with only breaches over +/-10% and +/-200 GJ being formally alleged.</p>
<p>2. Do you agree that the proposed threshold for rules 67.3, 70.2 and 72.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?</p>	<p>2.1 Trustpower agrees – we should be able to backdate a standard switch on a GNT. However we are concerned that limiting to same calendar month may be too restrictive, if switching over the cusp of a month.</p> <p>2.2 We agree with the new thresholds around flagging breaches versus alleging breaching.</p>
<p>3. Do you agree that the proposed threshold for rules 69.1 and 69.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?</p>	<p>3.1 Trustpower supports this proposal.</p>